

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ESTATE OF VALERIE YOUNG, et al.,

plaintiffs,

against

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION AND DEVELOPMENTAL
DISABILITIES, *et al.*,

defendants.

Electronically Filed

Case No.: 07-CV-06241 (LAK)

**MOTION TO COMPEL
PRODUCTION OF
DOCUMENTS AND ANSWERS
TO INTERROGATORIES**

PLEASE TAKE NOTICE THAT, upon the Declaration of Jonathan Bauer, signed under penalty of perjury on March 12, 2008 and the exhibits annexed thereto, including among other exhibits, the Declaration of Jacques Catafago, Esq. dated March 12, 2008, the Plaintiffs' Second Request for Production and Second Set of Interrogatories both dated December 22, 2008, the Plaintiffs hereby move pursuant Fed. R. Civ. P. Rules 33, 34 and 37, and the Chambers Rules of this Court at page 2 for an order requiring the defendants to fully and completely respond to the plaintiffs' Production Requests and Interrogatories served December 22, 2007 by identifying (by Bates Number) the documents that are a part of the files of each of the defendants concerning Valerie Young and producing any such documents and electronic data not a part of the prior production, including, but not limited to electronic mail and data compilations.

Dated: New York, New York
March 13, 2008

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s/

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